

1541

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

AARON WAKEFIELD

JAMAL JONES

KARON TELLIVER

AVRAM ABRAMOVITZ

Criminal No. 21-382
(21 U.S.C. § 846)

[UNDER SEAL]

FILED

AUG 31 2021

INDICTMENT

COUNT ONE

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

The grand jury charges:

From in and around October 2019, and continuing thereafter to in and around July 2021, in the Western District of Pennsylvania, the defendants, AARON WAKEFIELD, JAMAL JONES, KARON TELLIVER, and AVRAM ABRAMOVITZ, did knowingly, intentionally and unlawfully conspire with one another and with persons both known and unknown to the grand jury, to distribute and to possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi).

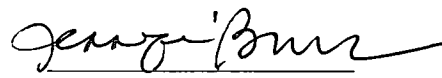
In violation of Title 21, United States Code, Section 846.

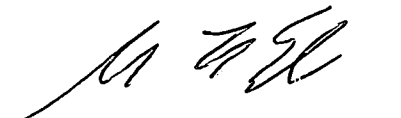
FORFEITURE ALLEGATIONS

1. The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference, as though fully set forth herein, for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Sections 853(a)(1), 853(a)(2), and 853(p).

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendants, AARON WAKEFIELD, JAMAL JONES, KARON TELLIVER, and AVRAM ABRAMOVITZ, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes \$15,000 in United States currency recovered from 203 Pine Valley Drive, Imperial, PA, on or about June 23, 2021, and \$960 in United States currency recovered from the person of KARON TELLIVER on or about June 23, 2021.

A True Bill,


Foreperson


STEPHEN R. KAUFMAN
Acting United States Attorney
PA ID No. 42108